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DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 02/19/2008

U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 19, 2008

BY FAX

Honorable Deborah A. Batts, Jr.
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Michelle Ramirez
07 Cr. 935 (DAB)

Dear Judge Batts:

The Government writes to respectfully request that the upcoming pretrial conference in this case be adjourned for two weeks and that time be excluded, pursuant to 18 U.S.C. § 3161(h)(8)(A), from Monday, February 25, 2008, to Monday, March 10, 2008, in the interests of justice pursuant to the Speedy Trial Act.

A pretrial conference was previously scheduled for Monday, February 25, 2008, at 10:30 am. However, the Government and the defense are currently engaging in the very final stages of plea discussions, which the parties expect will be complete in the next 2 weeks. The Government therefore requests that the DAB/ conference be adjourned to March 10, 2008, and that time be excluded until then, because such an exclusion of time will enable the defendant to continue such plea discussions with the Government regarding a possible disposition of this case without trial. Accordingly, excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial.

SO ORDERED

Deborah A. Batts

DEBORAH A. BATTIS
UNITED STATES DISTRICT JUDGE

The conference is now scheduled for March 10, 2008 at 11:00 AM.

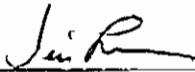
MEMO ENDORSED

Honorable Deborah A. Batts
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I have spoken with Steven Statsinger, Esq., counsel for the defendant, who consents to this request.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By: 

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Assistant United States Attorney
(212) 637-2263

cc:
Steven M. Statsinger, Esq. (By fax)